

**IN THE UNITED STATES DISTRICT COURT  
OF THE DISTRICT OF COLUMBIA**

**BUZZFEED INC.,**  
111 East 18th Street, 13th Floor  
New York, NY 10003

**Plaintiff,**

**v.**

**U.S. DEPARTMENT OF TREASURY,**  
1500 Pennsylvania Ave NW,  
Washington, D.C. 20220

**Defendant.**

**Case No. 19-cv-3024**

**COMPLAINT**

1. Plaintiff, BUZZFEED INC., brings this Freedom of Information Act suit to force Defendant U.S. DEPARTMENT OF TREASURY to produce records for certain closed investigations, audits, and complaints conducted by the U.S. DEPARTMENT OF TREASURY's Office of Inspector General.

**PARTIES**

2. Plaintiff BUZZFEED INC. is a member of the media and made the FOIA requests at issue in this case.

3. Defendant U.S. DEPARTMENT OF TREASURY ("U.S. TREASURY") is a federal agency subject to the Freedom of Information Act, 5 U.S.C. § 552.

**JURISDICTION AND VENUE**

4. This case is brought under 5 U.S.C. § 552(a)(4)(B) and presents a federal question conferring jurisdiction on this Court. *See* 28 U.S.C. § 1331.

5. Venue is proper under 5 U.S.C. § 552(a)(4)(B).

**JULY 11, 2019, FOIA REQUEST**

6. On July 11, 2019, BUZZFEED submitted a FOIA request to U.S. TREASURY seeking: “Copies of the report of investigation, final report, closing memo, memo for the record or file and referral letter associated with the following closed IG investigations, audits, [and] complaints. This should include the supporting documents the OIG collected and used to draft any final report, audit, closing memo, or referral letter. [1] OCC ID: 17-1024-1034, [2] USM-19-0035-I, [3] FinCEN-16-2102-, [4] FinCEN-19-0026-, [5] OCC-17-0813-I, [6] BEP-18-0100-I, [7] BANK-11-0730-I, [8] DO-18-0075-I, and [9] BFS-18-0102-I.” Exhibit A.

7. BUZZFEED also requested a fee waiver. Exhibit A.

8. U.S. TREASURY never acknowledged the request.

9. As the date of this filing, U.S. TREASURY has not issued a determination on the request and has produced no records responsive to the request.

**COUNT I – U.S. TREASURY’S FOIA VIOLATION**

10. The above paragraphs are incorporated herein.

11. U.S. TREASURY is a federal agency and is subject to FOIA.

12. The requested records are not exempt under FOIA.

13. U.S. TREASURY has refused to produce the requested materials in a timely manner.

**WHEREFORE**, BUZZFEED asks the Court to:

- i. declare that Defendant has violated FOIA;
- ii. order Defendant to conduct a reasonable search for records and to produce the requested records;
- iii. enjoin Defendant from withholding non-exempt public records under FOIA;

- iv. award Plaintiff attorneys' fees and costs;
- v. award such other relief the Court considers appropriate.

Dated: October 9, 2019

RESPECTFULLY SUBMITTED,

/s/ Matthew V. Topic

Attorney for Plaintiff

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